

Presentment Date and Time: August 11, 2014 at 12:00 noon (ET)

Objection Deadline: August 11, 2014 at 11:00 a.m. (ET)

Hearing Date and Time (Only if an Objection is Filed): August 12, 2014 at 10:00 a.m. (ET)

QUINN EMANUEL URQUHART & SULLIVAN, LLP

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Counsel for Lehman Brothers Holdings Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
: Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., *et al.*, :
:
Debtors. :
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**NOTICE OF PRESENTATION OF [PROPOSED] TOLLING AGREEMENT AND
STIPULATED ORDER RELATING TO FRAUDULENT TRANSFER CLAIMS OF
INDIVIDUAL LBHI CREDITORS**

PLEASE TAKE NOTICE that, in resolution of the Motion of Lehman Brothers Holdings Inc. for an Order (I) Determining (A) Automatic Stay Remains in Full Force and Effect and (B) Applicability of State Law Tolling Statutes and 11 U.S.C. § 108(C) to State Law Constructive Fraudulent Conveyance Claims of Individual Creditors or, in the alternative, (II) Seeking a Limited Modification of the Stay [Docket No. 45406 (08-13555-SCC)], the undersigned will present the annexed Tolling Agreement and Stipulated Order Relating to Fraudulent Transfer Claims of Individual LBHI Creditors (the "Stipulation") to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, for signature on **August 11, 2014 at 12:00 noon (ET)**.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Stipulation must be in writing, must conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, must set forth the name of the objecting party, the basis for the objection and the specific grounds therefore, and must be filed with the Bankruptcy Court, electronically in accordance with General Order M-242 (General Order M-242

and the User's Manual for the Electronic Case Filing System may be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court's case filing system, and by all other parties in interest on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy hand delivered directly to the Chambers of the Honorable Shelley C. Chapman at the United States Bankruptcy Court, Southern District of New York, One Bowling Green, Courtroom 623, New York, New York 10004), in accordance with General Order M-242, and any objection must further be served upon (i) The Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: William K. Harrington, Esq., Susan Golden, Esq., and Andrea B. Schwartz, Esq.; (ii) Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, 22nd Floor, New York, New York 10010, Attn: Susheel Kirpalani, Esq. and Andrew J. Rossman, Esq., attorneys for Lehman Brothers Holdings Inc.; and (iii) Wachtell, Lipton, Rosen & Katz, 51 West 52nd Street, New York, NY 10019, Attn: David C. Bryan, Esq., Emil A. Kleinhaus, Esq., and Paul Vizcarrondo, Esq., attorneys for JPMorgan Chase Bank, N.A., so as to be filed and received by no later than **August 11, 2014 at 11:00 a.m. (ET)**. Unless objections are timely received in accordance with this paragraph, the Stipulation may be entered without a hearing.

PLEASE TAKE FURTHER NOTICE that only if a written objection is timely filed, a hearing will be held on **August 12, 2014 at 10:00 a.m. (ET)** before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the United States Bankruptcy Court, Southern District of New York, One Bowling Green, Courtroom 623, New York, New York 10004. The moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: New York, New York
August 6, 2014

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Susheel Kirpalani

Susheel Kirpalani

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